

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207

June 14, 2004



December 23, 2002

County of Los Angeles
Department of Regional Planning
Attn: Mark Herwick,
320 West Temple Street
Los Angeles, California 90012

**Comments on Notice of Preparation for Comprehensive Update and Amendment
to the Los Angeles County General Plan**

Dear Mr. Herwick:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Notice of Preparation (NOP) and Initial Study (IS) for Comprehensive Update and Amendment to the Los Angeles County General Plan (Project No. 02-305). The majority of the comments in this letter focus on the Significant Ecological Area (SEA) boundaries proposed in the document. (Because no additional information was provided in the NOP regarding management practices for these SEAs, we do not provide additional comments at this time regarding these.) This letter reiterates many of the comments provided by the Conservancy to Los Angeles County (County) on the Los Angeles County Significant Ecological Area Update Study 2000 documents (PCR *et al.* 2000a, 2000b) in a letter dated April 30, 2001 (enclosed).

The General Plan update effort includes the following (IS, pp. 1-2):

- Revisions to growth policies by updating population and housing projections for a new plan horizon year of 2025;
- Revisions to SEA boundaries and related policies, standards, and procedures;
- Technical conversion of land use policy maps to a digital format and realignment of boundaries to reflect assessor parcel boundaries;
- Revisions to transportation policy maps and highway plan;
- Revisions to Conservation and Open Space Element to reflect major changes in laws and current planning practices related to watershed planning and abatement of pollution from storm water runoff; and
- Revisions to boundaries of area and community plans to reflect recent city incorporations.

Full Support for Specific SEA expansions and Some General Plan Objectives

The Conservancy continues to commend the County and the consultant team on the excellent work done for the SEAs and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy continues to support the proposal to expand several existing SEAs, and to create the proposed Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara, and the East San Gabriel Valley SEAs. We support the additional expansion of the proposed SEAs since the SEA Update Study 2000, including a portion of the San Andreas Rift Zone SEA (in the northwest part of the County), and an area in the Castaic area near the Santa Clara River SEA (contiguous and south of the Angeles National Forest, bordered on the west by the Ventura-Los Angeles County line, and on the east by Interstate-5 [I-5]). (Please note that we look forward to providing additional comments when maps with a better scale are provided for public comments.)

The Conservancy also supports several project objectives identified in the IS, including “[p]reserve critical lands, including....strategic open lands” (IS, p. 3), and

“[p]rotect the National Forests and Santa Monica Mountains National Recreation Area for their significant natural communities, wildlife corridors, water recharge areas, and recreational opportunities...” (IS, p. 4).

Maximum Inclusion of SEAs in Incorporated Areas

The Conservancy's April 30, 2001 letter recommends that the County analyze areas of existing SEAs in within City jurisdictions in the geographic limits of the County because some cities recognize the importance of SEAs in their General Plans, Zoning Ordinances, and special protective guidelines. To this end, the Conservancy supports the inclusion of the Verdugo Mountains and Tujunga Valley/Hansen Dam existing SEAs, as well as Griffith Park SEA, in the proposed SEAs (as shown on Figure 4 of the IS). These SEAs were not included in the SEA Update Study 2000. The Conservancy continues to recommend that because Ballona Creek will be studied later by a team comprised of County and City of Los Angeles appointees, a mechanism should be in place to include it later as an SEA.

Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy appreciates the County's efforts to partially incorporate the recommendations from the Conservancy's April 30, 2001 letter to expand the Santa Susana

Mountains/Simi Hills SEA proposed in the November 2000 Update Study to include two additional areas (identified as Area A and Area B in our April 30, 2001 letter), and portions of the triangle of land north of the State Route (SR) 14 and I-5 intersection. However, we offer four main comments to fine-tune the boundaries of this SEA.

First, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area A (see April 30, 2001 letter), effectively including Browns and Mormon Canyon. Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. Although the exact location of the proposed SEA boundary in this area is difficult to determine based on the scale of Figure 4, it appears that only part, or only the west side, of Mormon Canyon is proposed to be included in this SEA. All but a short section of Mormon Canyon is undeveloped, contributing to the ecological value of this canyon. Mormon Canyon is part of the Santa Susana Mountains ecosystem, and there appears to be no justification why half of the canyon would be cut out of this SEA. The entire canyon, including both sides of the canyon, and appropriate buffer (as shown in our proposed Area A) must be included in this SEA.

Second, Santa Susana Mountains/Simi Hills SEA should be expanded to incorporate all of our proposed Area B (see April 30, 2001 letter). The SEA should include all of the undeveloped area south of Pico Canyon, to the Old Road, up to the SEA boundary proposed in the IS. This area is ecologically important due to the presence of core wildlife habitat and high quality oak woodlands.

Third, we recommend that Santa Susana Mountains/Simi Hills SEA (or the expanded adjacent Santa Clara River SEA) be further expanded to include a critical area of the triangular habitat area north of the intersection of the north of the SR 14 and I-5 intersection (see Area C on the enclosed figures). This area is identified as a "Missing Linkage"¹ and preservation of the biological function of this area is essential to maintain connectivity between San Gabriel Mountains and Santa Susana Mountains. This triangle of land also contains high quality oak woodland and big-cone douglas fir.

Fourth, Santa Susana Mountains/Simi Hills SEA boundary should reflect a connection between existing SEA 64 (west of, and adjacent to I5, including the Westridge Open Space), and the remainder of the Santa Susana Mountains/Simi Hills proposed SEA (see Area D on

¹"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

the enclosed figures). These areas are currently ecologically connected, and there appears to be no biological justification to representing them as isolated areas. (In the November 2000 Update Study, the SEA boundaries reflected these areas as connected.) The Conservancy prefers to depict the connection partially through the existing private open space on the developed Stevenson Ranch property, and partially through the Stevenson Ranch Phase V property (not yet built).

Deletion of Pico Canyon Road from the Master Plan of Highways

The Conservancy and its Joint Powers Authority, the Mountains Recreation and Conservation Authority (MRCA), cooperatively own and manage the 4,000-acre Santa Clarita Woodlands Park. Pico Canyon Road terminates within the northern portion of this park at the historic oil town of Mentryville. The ultimate alignment and width of Pico Canyon Road will be the principal determinant of whether the canyon's remaining scenic qualities are preserved.

The Conservancy recommends that Pico Canyon Road be deleted from the County's Master Plan of Highways. This recommendation is consistent with the Newhall Ranch Specific Plan Environmental Impact Report (EIR), which recommended deleting Pico Canyon south of the Specific Plan Area from the County's Master Plan of Highways. In addition, the NOP for the Stevenson Ranch Phase V project anticipates Pico Canyon Road to be a two-lane road with only minor contributions to any future project circulation needs. The owners of Stevenson Ranch Phase V property and the Southern Oaks project (Tract No. 43896) are not in favor of any further extension of Pico Canyon Road at highway design standards. This well-defined lack of future need to build Pico Canyon Road at highway standards, in combination with the regionally significant scenic, recreational, hydrological, and ecological resources of the concerned portion of Pico Canyon, dictates the protection of these public resources. Pico Canyon Road should be downgraded from a highway to a collector street on the County's Master Plan of Highways.

Need for Policies to Protect Wildlife and Wildlife Movement With Respect to Roadways and Development

The General Plan should discuss the issue of compatibility of roadways with wildlife in the Circulation Element and the Conservation and Open Space Element. Some impacts to wildlife from roadways include impeding wildlife movement and increasing road kill. Policies to avoid, minimize, and mitigate impacts to wildlife during continued operation of existing roadways and construction of new and expanded roadways should be included in the General Plan.

The General Plan must show in detail where potential habitat linkages remain to connect large regional open space areas. They should receive a special wildlife corridor designation. The General Plan would be deficient without recognizing these connections.

Specifically the General Plan should address wildlife movement across SR-14, in the stretch of SR-14 between Santa Clarita and Palmdale, in light of any proposed infrastructure improvements or development projects along SR-14. This area has been identified as a "Missing Linkage"¹ because it affords the potential habitat connection between the two portions of the Angeles National Forest, or between the San Gabriel Mountains and the Sierra Pelona Range.

The above-described potential habitat connection across SR-14 connects to another potential habitat connection across I-5, also identified as a "Missing Linkage"¹. The General Plan should address wildlife movement across this area of I-5, north of Castaic to the Los Angeles County/Kern County line. This area provides for a potential habitat connection between the Angeles National Forest and Los Padres National Forest. The General Plan should include the following information for this potential habitat connection along I-5: the extent of open space remaining along this linkage, the presence and condition of existing underpasses, strategic potential locations for new underpasses to maximize wildlife movement, and where existing publicly-owned open space lands could complement those existing and potential new underpasses. This information is necessary to adequately analyze the impacts from any proposed infrastructure improvements or development projects along I-5, which may result from the General Plan guidelines.

Scenic Highway Element

Per p. 15 of the document, the Scenic Highway Element will be rescinded and in its place, a scenic highway element will be added to the Circulation Element. This revision will eliminate most urban routes depicted in the adopted Scenic Highway Element, and will in turn focus on the scenic qualities present in rural routes (IS, p. 15). We look forward to reviewing which of these scenic highway designations will be eliminated.

Other Comments from Conservancy's April 30, 2001 Letter

The Conservancy continues to make the following comments consistent with its April 30, 2001 letter:

¹"Missing Linkages: Restoring Connectivity to the California Landscape." Conference held on November 2, 2000, San Diego, California. Proceedings written and compiled by Kristeen Penrod, South Coast Wildlands Project.

- Expand the Santa Monica Mountains SEA to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon;
- Expand the proposed San Gabriel Canyon SEA westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon, although the Conservancy notes that some small areas were added since the SEA Update Study 2000;
- Support Wildlife Corridor Conservation Authority's comments regarding the Puente Hills SEA;
- Apply a more comprehensive approach to designating the boundaries of the Santa Clara River SEA; and
- Consider including the Baldwin Hills as an SEA.

Thank you for the opportunity to comment on this document. We look forward to reviewing and commenting on the EIR. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

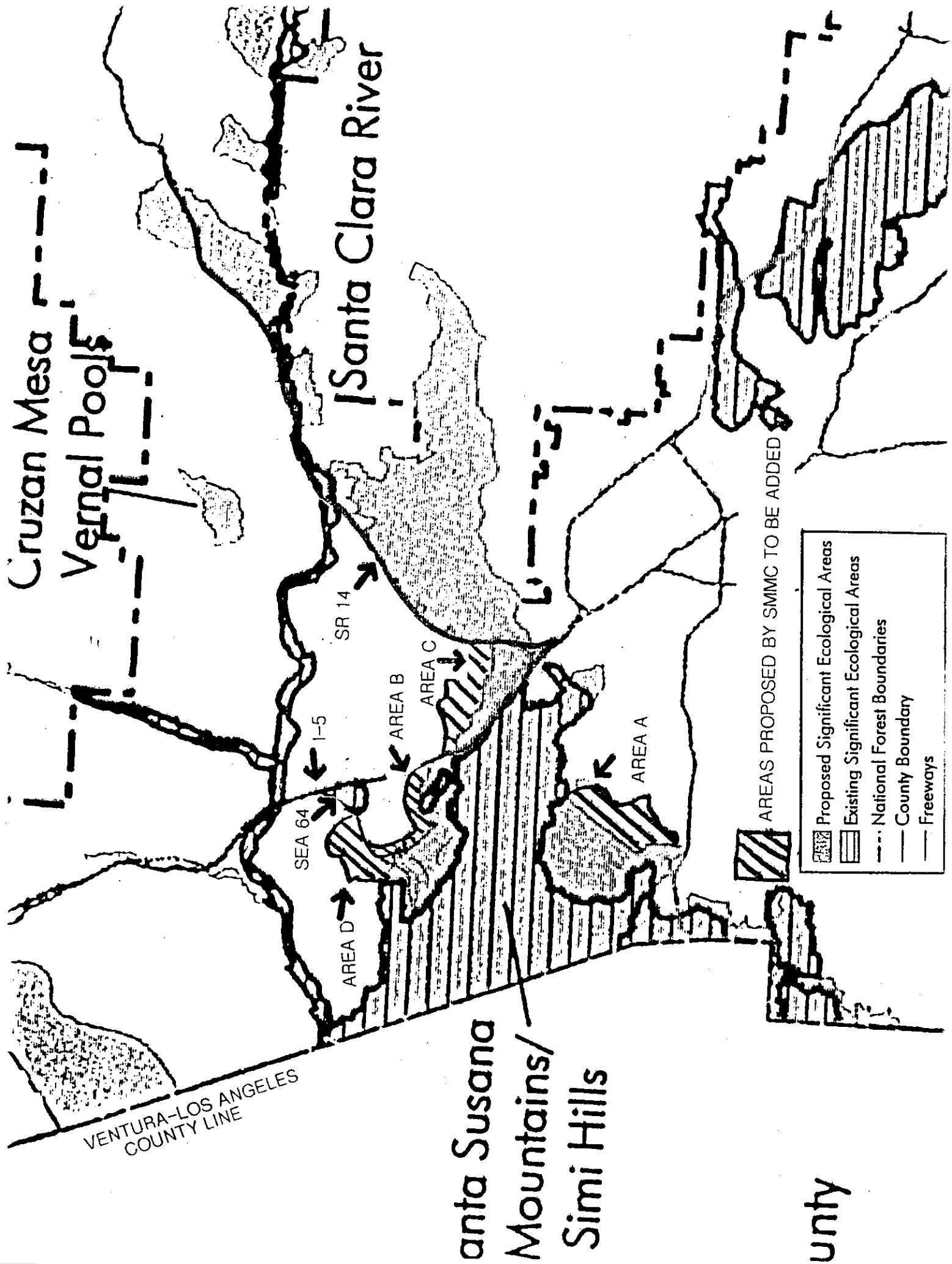


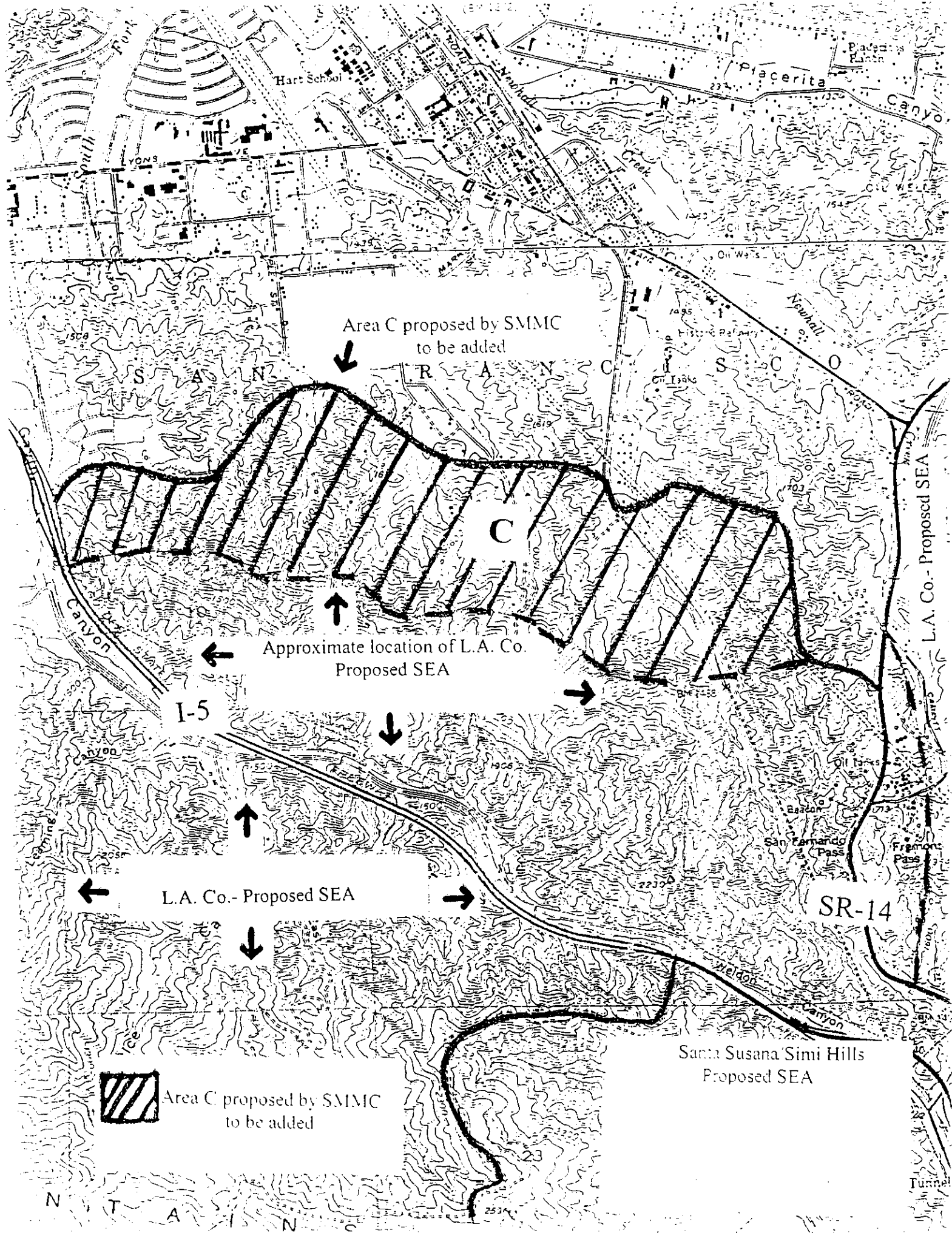
MICHAEL BERGER
Chairperson

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PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.



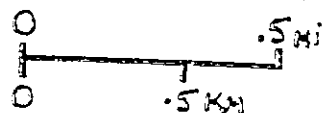


Santa Clara

Potential Open Space Connections in the NE Santa Susana Mtns

Newhall Ranch
Specific Plan Area

- Existing public open space
- Potential open space
- Private open space
- Private land
- Area developed
- Proposed development
- Sea boundary



Specific Plan Boundary

Stevenson Ranch
Phase V

D

SEA 20

Approximate location of L.A. Co.-
Proposed SEA

BLM

Mentryville

Approximate location of L.A. Co.-
Proposed SEA

SMMC

Newhall Ranch
Open Space

Newhall Specific Plan Boundary

Areas proposed by SMMC
to be added

Santa Susana Mtns./Simi Hills
Proposed SEA

BLM



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RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



April 30, 2001

George Malone, Section Head
General Plan Development Section
Los Angeles County, Department of Regional Planning
320 West Temple Street, Room 13th Floor
Los Angeles, California 90012

**Comments on Los Angeles County
Significant Ecological Area Update Study**

Dear Mr. Malone:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Los Angeles County Significant Ecological Area Update Study 2000 documents prepared by the consultant team for the County of Los Angeles (County) (PCR *et al.* 2000a, 2000b). The County is revising the boundaries and regulatory policies for the existing 61 Significant Ecological Areas (SEAs) as part of the General Plan update effort. The objective of the SEA program has been expanded to include the future sustainability of biotic diversity in the County through the application of more current practices in conservation biology, primarily by consolidation into larger, interconnected SEAs (PCR *et al.* 2000b).

The Conservancy commends the County and the consultant team on the excellent work done for the SEA Update Study and specifically on the efforts to propose more inclusive and biologically sound SEAs. The County and consultant team have made great strides in this effort and are moving in the right direction. The Conservancy offers the following specific comments, and we look forward to working with the County and other interested parties to include the SEAs in the General Plan as recommended by the consultants.

Full Support for Specific SEA Expansions

The Conservancy fully supports the consultants' proposal to expand several existing SEAs, including the following: Santa Monica Mountains, San Andreas Rim Zone, Antelope Valley, Santa Clara River, and the East San Gabriel Valley. The entire Santa Monica Mountains range represents the nation's premier example of a Mediterranean ecosystem and meets all of the criteria for inclusion as an SEA. The San Andreas Rim Zone encompasses several regionally significant linkages for wildlife movement and globally unique vegetation communities. The proposed Antelope Valley SEA provides crucial

connectivity for wildlife movement, encompassing open washes, historic floodplains, riparian communities, desert scrub, and Joshua tree woodlands (PCR *et al.* 2000b). Along the Santa Clara River, which is known to support numerous state and federally-listed species, the SEA boundary was proposed to be expanded along the western and northwestern edge of the Angeles National Forest, both inside and outside of the forest boundary. The proposed East San Gabriel Valley SEA contains critical habitat and a core population of the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*), and supports numerous plant communities restricted in distribution.

Maximum Inclusion of SEAs in Incorporated Areas

Some proposed SEAs that were studied included areas within a city jurisdiction while some SEAs were not studied because they occurred within a city jurisdiction. Some cities recognize the importance of existing SEAs in their General Plans, Zoning Ordinances, and special protective guidelines (PCR *et al.* 2000a). In coordination with other jurisdictions, the County should analyze the areas of existing SEAs within city jurisdictions in the geographic limits of Los Angeles County. At the very least, these areas of SEAs should be retained, as recommended by the consultant team (p. v; PCR *et al.* 2000a). For example, the Griffith Park existing SEA No. 37 was not studied because it is entirely within the City of Los Angeles jurisdiction (PCR *et al.* 2000a). Griffith Park and any remaining contiguous habitat should be included. Tujunga Valley/Hansen Dam and Verdugo Mountains existing SEAs should also be retained. In addition, because Ballona Creek will be studied later by a team comprised of the County and City of Los Angeles, a mechanism should be in place to include it later as an SEA.

Inclusion of Mandeville and Hoag Canyons in the Santa Monica Mountains SEA

The Conservancy recommends that the Santa Monica Mountains SEA be expanded to the east to include the eastern ridge of Mandeville Canyon through Upper Kenter Canyon to the 405 Freeway and east of the 405 Freeway to Hoag Canyon. This would provide for greater protection for the corridor used by wildlife to travel from the 405 Freeway to Griffith Park. In addition, both canyons contain core habitat values. Hoag Canyon contains the best example of sycamore and oak woodlands in the Santa Monica Mountains east of Topanga Canyon.

Additions to the Santa Susana Mountains/Simi Hills SEA

The Conservancy recommends adding to the proposed Santa Susana Mountains/Simi Hills SEA an area encompassing Browns Canyon and part of Mormon Canyon (see Enclosure).

Browns and Mormon Canyons are biologically critical components of the eastern Santa Susana Mountains ecosystem. With the exception of adjacent Devil Canyon, all other drainages on the southern-face of the Santa Susana Mountains within Los Angeles County are developed along their full lengths. Together, the Browns and Devil Canyon watersheds form the most ecologically rich block of habitat in this portion of the mountain range.

We concur with Don Mullally (see February 10, 2001, comment letter) that the wildlife corridors at Fremont Pass and Newhall Pass, located north of the intersection of the 14 and 5 Freeways, and connecting the San Gabriel Mountains to the Santa Susana Mountains, should be added to one of the SEAs (e.g., Santa Susana/Simi Hills SEA). This triangle of land between the San Gabriel Mountains and the Santa Susana Mountains is essential to maintain connectivity between the ranges. Over 75% of the undeveloped land in this triangle is of SEA quality with high quality oak woodland and big-cone douglas fir. We also concur with Mr. Mullally that the discussion of plant communities for the Santa Susana Mountains should be more extensive, including such plant communities as big-cone douglas fir associations, walnut woodlands, and native grasslands.

The Conservancy recommends that portions of the Pico Canyon watershed, as shown on the Enclosure, be included in this SEA. Much of this land is adjacent to extensive public ownership and is part of the core habitat area comprising the adjacent SEA.

Expansion of San Gabriel Canyon SEA to include Altadena and La Crescenta Foothills

The Conservancy recommends that the proposed San Gabriel Canyon SEA be expanded westward to encompass the foothills of Altadena and Crescenta Valley to Tujunga Canyon. This proposed expansion encompasses pristine chaparral, oak woodland, and riparian canyon bottoms. For example, Lower Millard Canyon in the Altadena foothills contains dense riparian woodland and heritage oak trees on upland shelves. These woodlands support a rich variety of warblers and other locally rare birds, reptiles, and amphibians. Animal species are able to move to different elevations in these canyons in response to seasonal changes and longer-term conditions such as drought.

These foothills of the San Gabriel Mountains provide for essential east-west wildlife habitat linkages between the north-south trending canyons. The SEA boundary must be moved westward to provide a complete east-west linkage system. An adequate lower elevation habitat linkage system is not contained in the higher elevation Angeles National Forest.

Concurrence with WCCA

The Conservancy concurs with the Wildlife Corridor Conservation Authority's recommendations adopted by their Governing Board regarding the proposed Puente Hills SEA in their May 2001 letter to the County.

Use Watershed Approach on Santa Clara River SEA

California Native Plant Society (CNPS) has recommended utilizing a watershed approach to define the SEAs. This approach should be considered by the County, particularly for the proposed Santa Clara River SEA. The Santa Clara River watershed including the river proper, surrounding upland areas, and tributaries have been documented to support numerous listed and otherwise sensitive species (PCR *et al.* 2000b). These species depend on substantial portions of undisturbed watershed. For this reason, the SEA must include additional drainages and slopes surrounding the Santa Clara River proper.

The Conservancy has previously commented to the County in reference to the Newhall Ranch Specific Plan and Draft Environmental Impact Report that a specific area be must be preserved (letter dated February 11, 1997). This includes a continuous habitat connection and natural land-trail corridor linking the existing Santa Clara River SEA No. 23 and the northern tip of the existing Santa Susana Mountains SEA No. 20. This also includes a prominent ridgeline, that defines the northern boundary of the existing SEA 20, separating the East Fork of Salt Canyon from the principal Potrero Canyon development area. It appears that the proposed Santa Clara River SEA contains this area, but it is difficult to determine this based on the maps provided. We request that this be verified by the County.

Inclusion of a Baldwin Hills SEA

The Land Capability/Suitability Study SEA Report (England and Nelson 1976), lists Baldwin Hills as SEA No. 38, but does not appear to be addressed in the SEA Update Study. The County and the Conservancy are members of the Baldwin Hills Regional Conservation Authority formed to coordinate open space preservation actions in the Baldwin Hills. A new state agency, the Baldwin Hills Conservancy, was established in January of this year. The Baldwin Hills supports a reasonably extensive example of coastal sage scrub left in the Los Angeles Basin. Coastal sage scrub is a California Department of Fish and Game sensitive rare natural community that has been reduced in range significantly and the Baldwin Hills would likely meet the criteria for an SEA.

Support for Implementation of Land Use Management Practices Guidelines

Comprehensive Land Use Management Practices are recommended for all projects within SEAs, along with specific management practices for each proposed SEA (PCR *et al.* 2000a). These general and specific guidelines include limiting the percentage of disturbance in the SEAs to no more than 20 percent, providing buffers for rare plant communities such as riparian forests, and limiting the density of development in the SEAs. The Conservancy agrees that land use management guidelines such as those proposed in the SEA documents, or ones which provide even more protection, must be implemented to preserve the integrity of the SEAs.

We also support CNPS's recommendation that additional ordinances be considered. These ordinances should be explored further and could include the Land Use Management Practices Guidelines in the subject document and CNPS's specific recommendations. In particular, they should include: requiring wildlife-friendly fencing in linkages or corridors, preserving habitat, requiring publicly-held conservation easements on ungraded land, as well as limiting impermeable surface area.

Expansion of Selection Criteria to Include Other Sensitive Species

Although the revised draft of selection criteria has already been distributed for review (p. 9; PCR *et al.* 2000a), please consider the following comment. Criterion A is limited to "the habitat of core populations of endangered or threatened plant or animal species," and does not include rare, candidate or proposed species. It would be logical to focus planning and resources on protecting core populations of rare species, in addition to threatened and endangered species, in order to reduce the likelihood of these species becoming listed in the future. The Conservancy also recommends adding "species previously thought be extinct" to this criterion. In the rare and fortunate event that a species that was previously thought to be extinct is rediscovered, that species would merit maximum protection, including designating the area which it inhabits as an SEA.

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April 30, 2001
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Thank you for the opportunity to comment on this document. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,



MICHAEL BERGER
Chairperson

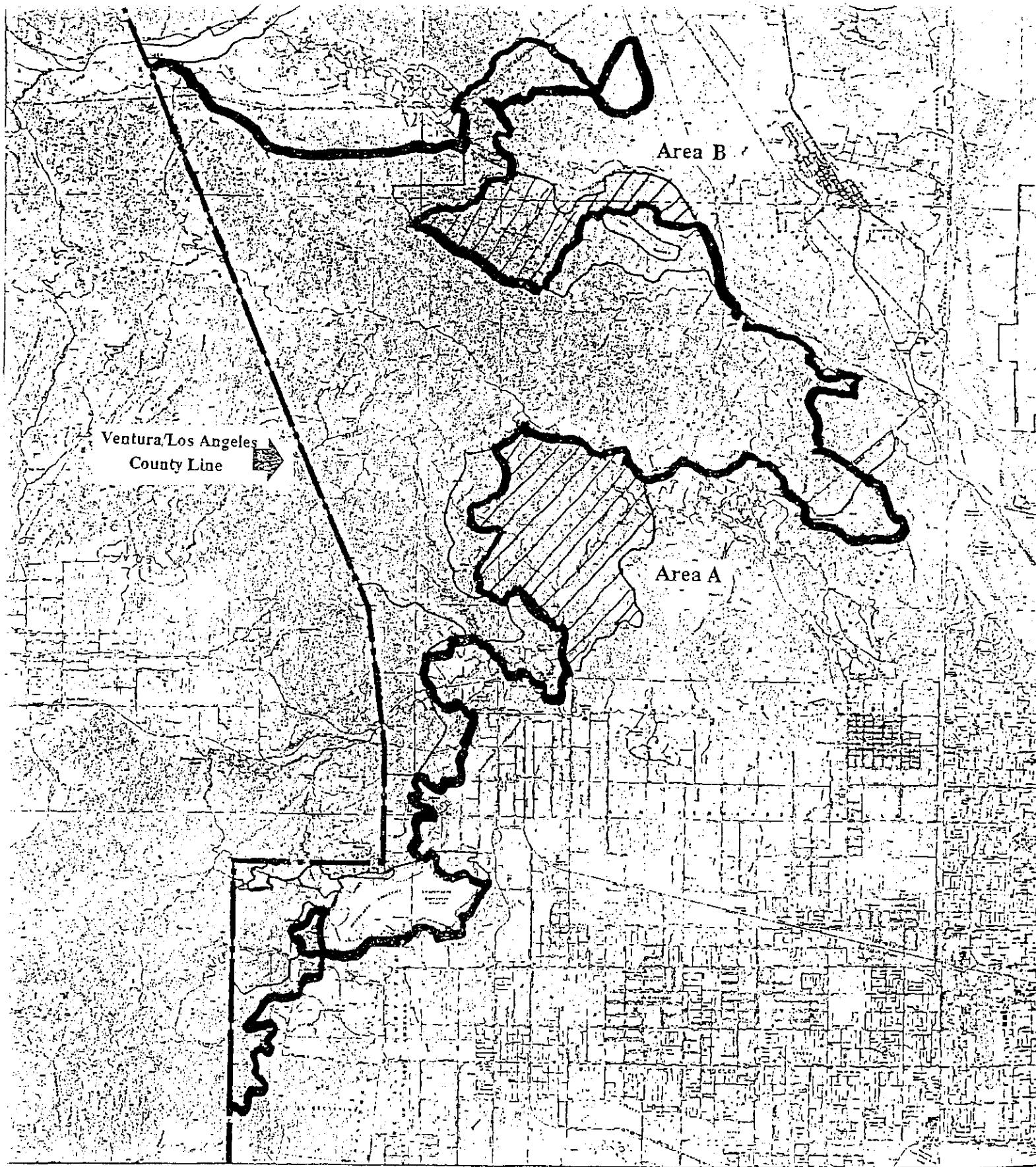
Enclosures (3)




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PCR Services Corporation, Frank Havore & Associates, and FORMA Systems. 2000b. Executive Summary of the Proposed Los Angeles County Significant Ecological Areas. Prepared for Los Angeles County Department of Regional Planning. November.



-  Proposed SEA Boundary
-  Existing SEA Boundary
-  Angeles National Forest


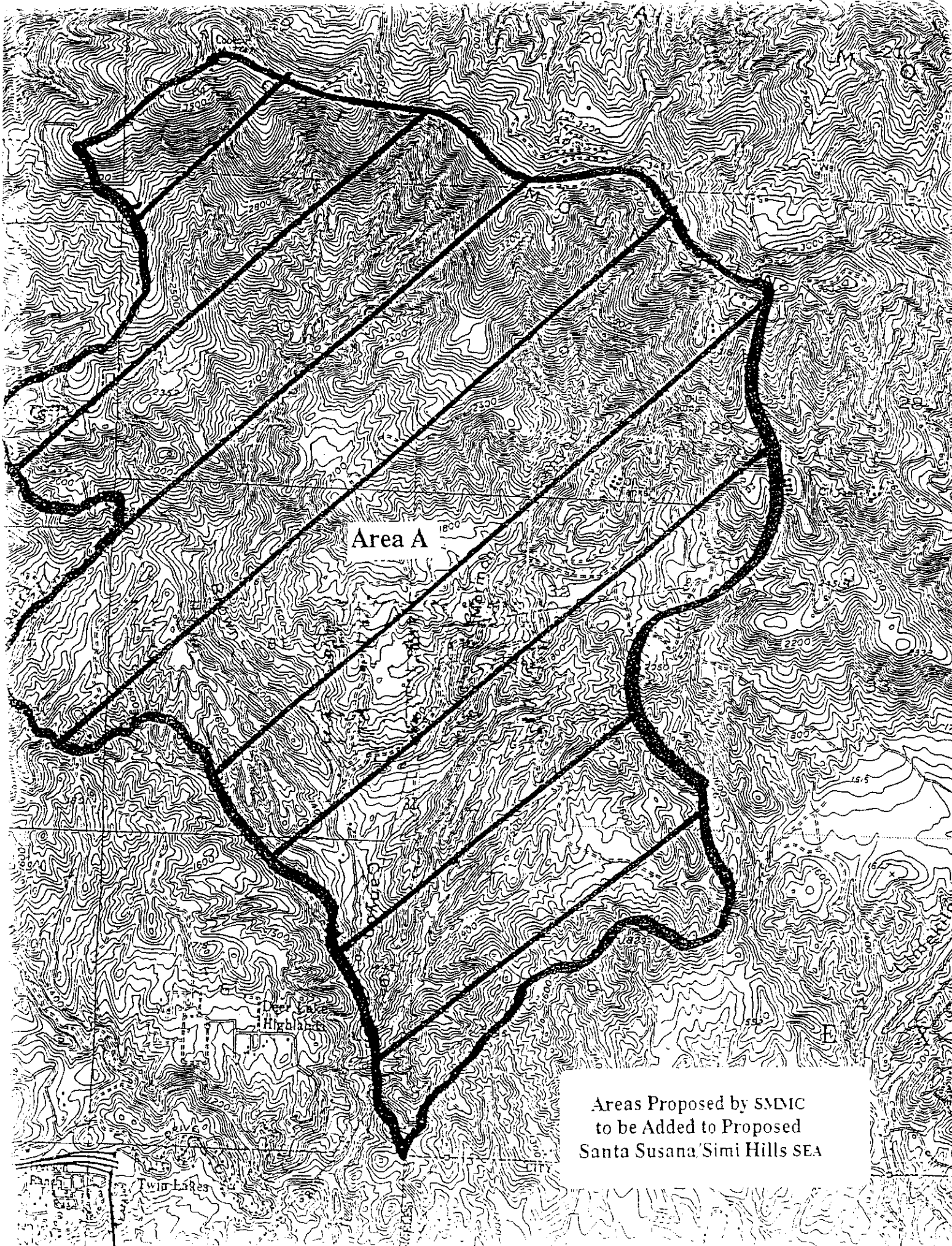

 Areas Proposed by SMMC
 to be Added to Proposed
 Santa Susana/Simi Hills SEA

Figure 2
 Santa Susana Mountains/Simi Hills
 Significant Ecological Area
 Existing and Proposed Boundaries

0 9400
 Feet

FORMA Systems
 10/24/00



Areas Proposed by SMMC
to be Added to Proposed
Santa Susana Simi Hills SEA

Areas Proposed by SMMC
to be Added to Proposed
Santa Susana/Simi Hills SEA

Area B

